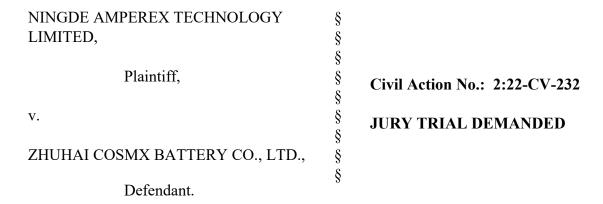
#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION



# JOINT MOTION TO APPOINT TIANLU REDMON AND VIVAN JOSH AS INTERPRETERS

Plaintiff Ningde Amperex Technology Limited ("ATL") and Defendant Zhuhai CosMX Battery Co., Ltd. ("CosMX") (collectively, "the Parties"), by and through their counsel, jointly file this motion to appoint Ms. Tianlu Redmon and Ms. Vivan Josh to serve as interpreters for the upcoming trial.

To reduce confusion and make efficient use of time, the interpreters will not raise disagreements or disputes regarding their interpretation in front of the jury or with the Court. Instead, Mss. Redmon and Josh will take turns interpreting during trial; and only one interpreter will be interpreting for the record at any given time.

Both Mss. Redmon and Josh are well qualified as Mandarin interpreters. Their CVs are attached as Exhibits 1 and 2 to this Motion. The Parties agree that Mss. Redmon and Josh will not be utilized by either side for trial witness preparation, and agree not to have *ex parte* communications with Mss. Redmon and Josh regarding the substance of this case.

#### DATED: January 25, 2024 Respectfully submitted,

By: /s/ Michael D. Powell

Michael D. Powell

California Bar No. 202850 Sean Pak (*pro hac vice*)

California Bar No. 219032

QUINN EMANUEL URQUHART & SULLIVAN LLP

mikepowell@quinnemanuel.com seanpak@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111 Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Lance Yang (*pro hac vice*) California Bar No. 260705

QUINN EMANUEL URQUHART & SULLIVAN LLP

lanceyang@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000

Facsimile: (213) 443-3100

G. Blake Thompson State Bar No. 24042033 Blake@TheMannFirm.com MANN | TINDEL | THOMPSON 112 E. Line Street, Suite 304 Tyler, Texas 75702 (903) 657-8540 (903) 657-6003 (fax)

Deron R. Dacus
Texas Bar No. 790553
THE DACUS FIRM, P.C. ddacus@dacusfirm.com
821 ESE Loop 323
Suite 430
Tyler Texas 75701

Tyler, Texas 75701

Telephone: (903) 705-1117 Facsimile: (903) 581-2543

Attorneys for Plaintiff Ningde Amperex Technology Limited

/s/ Jeffrey C. Totten

Eric H. Findlay

Texas Bar No. 00789886

FINDLAY CRAFT PC

102 N College Avenue, Suite 900

Tyler, TX 75702 Tel: 903-534-1100 Fax: 903-534-1137

Email: efindlay@findlaycraft.com

Charles B. Walker, Jr.

Texas Bar No. 00794808

Layne E. Kruse

Texas Bar No. 11742550

Darryl W. Anderson

Texas Bar No. 24008694

Dewey J. Gonsoulin III

Texas Bar No. 24131337

NORTON ROSE FULBRIGHT US LLP

Fulbright Tower

1301 McKinney St, Suite 5100

Houston, TX 77010-3095

Telephone: (713)-651-5151

Facsimile: (713)-651-5246

Email: charles.walker@nortonrosefulbright.com Email: layne.kruse@nortonrosefulbright.com

Email: darryl.anderson@nortonrosefulbright.com Email: dewey.gonsoulin@nortonrosefulbright.com

Eric C. Green

Texas Bar No. 24069824

Valerie K. Barker

Texas Bar No. 24087141

NORTON ROSE FULBRIGHT US LLP

98 San Jacinto Boulevard, Suite 1100

Austin, Texas 78701-4255

Tel: 512-536-3073

Fax: 512-536-4598

Email: eric.green@nortonrosefulbright.com Email: valerie.barker@nortonrosefulbright.com

Qingyu Yin (admitted *pro hac vice*)

Jeffrey C. Totten (admitted pro hac vice)

Lauren J. Robinson (admitted pro hac vice)

Tyler B. Latcham (admitted *pro hac vice*)

Seke G. Godo (admitted *pro hac vice*)

Finnegan, Henderson, Farabow, Garrett & Dunner,

LLP

901 New York Avenue, NW Washington, DC 20001-4413

Tel: 202-408-4213 Fax: 202-408-4400

Email: qingyu.yin@finnegan.com Email: jeffrey.totten@finnegan.com Email: lauren.robinson@finnegan.com Email: tyler.latcham@finnegan.com Email: seke.godo@finnegan.com

Yanyi Liu (admitted pro hac vice)

Finnegan, Henderson, Farabow, Garrett & Dunner,

LLP

Stanford Research Park

3300 Hillview Avenue, 2nd Floor

Palo Alto, CA 94304-1203

Tel: 650-849-6626 Fax: 650-849-6666

Email: yanyi.liu@finnegan.com

Counsel for Defendant Zhuhai CosMX Battery Co., Ltd.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on January 25, 2024, all counsel of record for Defendant who are deemed to have consented to electronic service are being served with a copy of this document via email.

/s/ Michael D. Powell

### **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Plaintiff has met and conferred with counsel for Defendant, and both Parties have agreed to the proposed order submitted herewith.

/s/ Michael D. Powell